

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

JOHN M. PITMAN, III, <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
vs.)	Civil Action No.: 4:16-cv-00179
)	
XCENTRIC VENTURES, LLC, <i>et al.</i>,)	
)	
Defendants.)	
)	

**PLAINTIFFS’ MOTION REGARDING THE SUFFICIENCY OF OBJECTIONS TO
PLAINTIFFS’ REQUESTS FOR ADMISSION
TO ANNA RICHTER AND TRACEY RICHTER**

COMES NOW, the Plaintiffs, John M. Pitman and Peninsula Plastic Surgery Center, LTD. (collectively the “Plaintiffs”), by counsel, and, pursuant to Federal Rules of Civil Procedure 36, move this Court to adjudicate the sufficiency of the objections of Anna Richter and Tracey Richter to the Plaintiffs’ Requests for Admission. The reasons for the Plaintiffs’ Motion are stated more fully in the accompanying memorandum in support.

WHEREFORE, the Plaintiffs respectfully request that the Court enter an order: (i) compelling responses by Anna Richter and Tracey Richter to the Plaintiffs’ Requests for Admission; (ii) in the alternative, finding that the matters at issue are deemed admitted; and (iii) for all other relief the Court deems necessary and proper.

Respectfully Submitted,

By: /s/ Seth D. Scott
Seth D. Scott (VSB #80907)
STANLEY & HOUCHENS, LLC
13508 Booker T. Washington Highway
Moneta, Virginia 24121
(540) 721-6028
(540) 721-6405 (facsimile)
sscott@shg-law.com

Aaron B. Houchens, Esq. (VSB #80489)
Seth D. Scott, Esq. (VSB#80907)
STANLEY & HOUCHENS, LLC
13508 Booker T. Washington Hwy.
Moneta, Virginia 24121
540-721-6028 (telephone)
540-721-6405 (facsimile)
ahouchens@shg-law.com
sscott@shg-law.com

Counsel for Plaintiffs John M. Pitman, III and Peninsula Plastic Surgery Center, LTD.

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2017, I will electronically file the foregoing Amended Notice of Appearance with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

David A. Warrington, Esq.
LeClair Ryan
2318 Mill Road, Suite 1100
Alexandria, Virginia 22314
Phone: (703) 647-5926
Fax: (703) 647-5966
david.warrington@leclairryan.com

Counsel for Defendant Xcentric Ventures, LLC and Edward Magedson

Jesse R. Binnall, Esq.
Louise T. Gitcheva, Esq.
717 King Street, Suite 300
Alexandria, Virginia 22314
Phone: (703) 888-1930
jbinnall@harveybinnall.com
lgitcheva@harveybinnall.com

Counsel for Defendants Anna Richter, Bert Pitman, and Tracey Richter

Darren M. Meade
darrenmitchellmeade949@gmail.com

/s/ Seth D. Scott
Seth D. Scott (VSB #80907)
STANLEY & HOUCHENS, LLC
13508 Booker T. Washington Highway
Moneta, Virginia 24121
(540) 721-6028
(540) 721-6405 (facsimile)
sscott@shg-law.com